



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

SEP 18 2009

Ref: 8EPR-N

FTA Region 8
David Beckhouse, Team Leader for Planning and Programs
C/O Gold Line Team
GBSM, Inc.
600 17th Street 2020-S
Denver, CO 80202

Re: Comments on the Gold Line
FasTracks Corridor Final
Environmental Impact Statement,
CEQ#: 20090289

Dear Mr. Beckhouse:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (FEIS) for the Gold Line FasTracks Corridor. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

The proposed project will provide commuter rail using Electrical Multiple Unit technology from Denver Union Station in downtown Denver to Ward Road in Wheat Ridge, Colorado. The total proposed alignment would be 11.2 miles long and include seven stations; the first 3.5 miles are shared with the proposed Northwest Rail project.

EPA commends the Federal Transit Administration (FTA) and Regional Transportation District (RTD) for the extensive inter-agency and public planning process, which has resulted in strong community support for the project's preferred alternative. We also thank the Gold Line EIS Team for responding to our comments on the Draft EIS in Volume II of this FEIS.

We are pleased to see the added documentation of permit required onsite detention ponds for storm water runoff from impervious surfaces in the FEIS. The proposed detention facilities will assist in reducing discharge of pollutants to surface waters from any jurisdictional municipal separate storm sewer system that may be associated with the proposed project. EPA recommends that you evaluate the design considerations for post construction facilities in the context of local contaminants of concern (including the stream impairments for E. coli, aquatic life use, and organic sediment in the project area). Discharge of pollutants should be reduced to

the maximum extent practicable, as described in the permit requirements.

EPA understands that the Driscoll model predicted increases in annual mass load from parking structures that would not result in runoff concentrations in exceedance of water quality standards. However, EPA does remain concerned that the small increase in discharges, when added to increased transit oriented development, could negatively affect impaired surface waters in the project area. We are also concerned with the level of confusion raised by the use of the Driscoll model, and explanation of model results, in this and other FasTracks projects. EPA is interested in engaging in conversations to resolve this issue. Particularly, we want to ensure that adequate documentation and disclosure of potential impacts are provided in the EIS, in accordance with NEPA.

We appreciate the opportunity to review and offer comments on this project. If you have any questions on the comments provided in this letter, please contact me at 303-312-6004, or you may contact Molly Brodin of my staff at 303-312-6577.

Sincerely,



Larry Svoboda
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

